

Philadelphia Customs Brokers & Forwarders Association

September 20, 2005

Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs
AMS, USDA
1400 Independence Avenue, SW
STOP 0237
Washington, DC 20250-0237

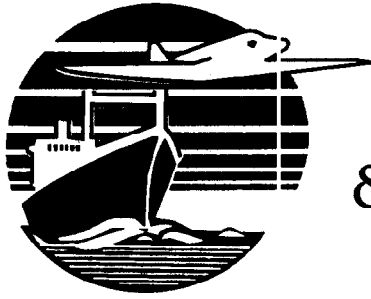
RE: Docket No. FV03-925-1PR
Federal Register Vol.70, No. 100, Page 30001
Grapes Grown in a Designated Area of Southeastern California and Imported
Table Grapes; Proposed Change in Regulatory Period
COMMENTS IN OPPOSITION TO PROPOSED CHANGE

Dear Docket Clerk:

The Philadelphia Customs Brokers & Forwarders Association opposes the above referenced change in the dates that Table Grape Marketing Order 925 restrictions will be placed on table grapes supplied from Chile. The PCBFA is an association representing 32 Customs Brokers & Forwarders in the Philadelphia region with a total employment exceeding 1,000 people. Our membership relies on the importation of fresh fruit & vegetables through the ports of Philadelphia to support their business.

PCBFA concurs with the detailed comments and supporting data submitted by ASOEX, the Chilean Exporters Association. Specifically, PCBFA urges the agency to reject the proposed change in the regulatory period because:

1. The change in the beginning effective date of the marketing order from April 20 to April 1 will have a direct negative impact on our business. Thus reducing the timeframe of imports transiting our ports and the financial impact of the community.



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2. The proposed rule does not contain sufficient evidence of circumvention by Chilean table grapes to warrant the proposed change.
3. The change in date from April 20 to April 1 will create an artificial shortage of table grapes since there is no other commercially significant and reliable supply from any source other than Chile.
4. The Chilean grapes supplied from April 1 to the earliest commercially significant supplies of grapes from Coachella Valley in California meet marketing specifications from retail chains that are more stringent in some respects than the marketing order requirements.
5. The proposed change cannot be validly based on a 20 year-old survey of cold storage practices.
6. The proposed change is not supported by any analysis of the record prices received by Coachella Valley growers in the last two seasons.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. Riley". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Brian Riley
Director

Ph# 267-570-2658